1 The Honorable David G. Estudillo 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 WILL CO. LTD. a limited liability company Case No.: 3:20-cv-05666-DGE organized under the laws of Japan, 10 AGREED REQUEST TO RENOTE Plaintiff, 11 PLAINTIFF'S OBJECTIONS TO REPORT AND RECOMMENDATION VS. 12 **DKT. NO. 76** KAM KEUNG FUNG, aka 馮錦強, aka 13 FUNG KAM KEUNG, aka FUNG KAM-14 NOTE ON MOTION CALENDAR: KEUNG, aka KUENG FUNG, aka KEUNG December 22, 2022 KAM FUNG, aka KAM-KEUNG FUNG, aka 15 KEVIN FUNG, an individual; FELLOW SHINE GROUP LIMITED, a foreign company, 16 and DOES 1-20, d/b/a AVGLE.COM, 17 Defendants. 18 19 20 AGREED REQUEST TO RENOTE MOTION 21 Subject to approval of this Court, Plaintiff Will Co. Ltd. and Defendants hereby agree 22 and request that Plaintiff's Objections to Report and Recommendations (Dkt. No. 76) be re-23 noted from January 2, 2023 to January 9, 2023, and thus the hearing for consideration from 24 January 6, 2023 to January 13, 2023. 25 The current date was set by the Report and Recommendation service on December 19, 26 2022. (See Dkt. No. 76). Plaintiff's counsel is schedule to be out of town December 25, 2022 to AGREED REOUEST TO RENOTE PLAINTIFF'S FREEMAN LAW FIRM, INC. OBJECTIONS TO REPORT AND 1107 1/2 Tacoma Avenue South RECOMMENDATION DKT. NO. 76-1 [NO. 3:20-cv-Tacoma, WA 98042 05666 DGE1 (253) 383-4500 - (253) 383-4501 (fax)

1 December 31, 2022 for a family vacation. The prescheduled vacation will not permit Plaintff's 2 counsel sufficient time to draft anticipated Objections. 3 The request for re-note the motion is made by agreement among Plaintiff's and Defendants' counsel to accommodate Plaintiff's counsel schedule and is not made for purposes 4 5 of delay or any other improper purpose. 6 7 DATED this 22nd day of December 2022. 8 9 FREEMAN LAW FIRM, INC. 10 s/Spencer D. Freeman Spencer D. Freeman, WSBA # 25069 11 FREEMAN LAW FIRM, INC. 12 1107 ½ Tacoma Avenue South Tacoma, Washington 98402 13 sfreeman@freemanlawfirm.org 14 Attorney for Plaintiff Will Co 15 16 17 /s/ Evan Fray-Witzer Evan Fray-Witzer (pro hac vice) 18 CIAMPA FRAY-WITZER, LLP 20 Park Plaza, Suite 505 19 Boston, Massachusetts 02116 20 Telephone: 617-426-0000 Facsimile: 617-423-4855 21 Evan@CFWLegal.com 22 Attorneys for Defendant 23 24 25 26

AGREED REQUEST TO RENOTE PLAINTIFF'S OBJECTIONS TO REPORT AND RECOMMENDATION DKT. NO. 76-2 [NO. 3:20-cv-05666 DGE]

FREEMAN LAW FIRM, INC.

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